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14 IN THE UNITED STATES DISTRICT COURT
15
16 EASTERN DISTRICT OF CALIFORNIA

17 UNITED STATES OF AMERICA,

18 CASE NO. 1:21-CR-00012

19 Plaintiff,

20 STIPULATION REGARDING EXCLUDABLE
21 TIME PERIODS UNDER SPEEDY TRIAL ACT;
22 FINDINGS AND ORDER

23 v.

24 ROBERTO GONZALEZ,

25 Defendant.

26
27 STIPULATION

28 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for jury trial on July 9, 2024.
2. By this stipulation, the parties now move to vacate the jury trial date for a change of plea on July 29, 2024.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The parties have entered into and filed a plea agreement in this matter. For that reason, the parties agree that a date of July 29, 2024, is warranted for a change of plea. Prior to filing this stipulation, the parties conferred with the courtroom deputy for the assigned district court judge, who indicated this date is available for a change of plea.
 - b) The parties stipulate that the period of time until July 29, 2024, is deemed excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv) because it

1 results from a continuance granted by the Court at defendants' request on the basis of the Court's
2 finding that the ends of justice served by taking such action outweigh the best interest of the
3 public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
5 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
6 must commence.

7 IT IS SO STIPULATED.

8 Dated: May 28, 2024

9 PHILLIP A. TALBERT
10 United States Attorney

11 /s/ STEPHANIE M. STOKMAN
12 STEPHANIE M. STOKMAN
13 Assistant United States Attorney

14 Dated: May 28, 2024

15 /s/ MARK BROUGHTON
16 MARK BROUGHTON
17 Counsel for Defendant
18 ROBERTO GONZALEZ

19 **FINDINGS AND ORDER**

20 IT IS SO FOUND.

21 IT IS SO ORDERED.

22 Dated: May 28, 2024

23 
24 UNITED STATES DISTRICT JUDGE